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April 30, 1997

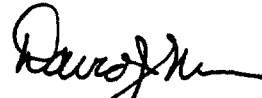
Office of the Secretary
Federal Communication Commission
1919 M Street, NW
Washington, DC 20554

To Whom It May Concern:

I am submitting these reply comments to the Federal Communications Commission in response to its Further Notice of Proposed Rulemaking, The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket 92-105.

Thank you.

Respectfully Submitted,



David J. Nelson
Advocate

Enclosure: Diskette with WordPerfect 5.1 and ASCII formats

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

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OFFICE OF SECRETARY

In the Matter of

The Use of N11 Codes and Other
Abbreviated Dialing Arrangements

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) CC Docket No. 92-105
)

REPLY COMMENTS OF DAVID J. NELSON

I would like to take this opportunity to reply to the comments that were filed with the FCC. As I stated in my comment filed on March 31, 1997, I am an advocate and a deaf person who has been involved with telecommunication issues for the past 10 years, mostly on the local level.

CORRECTION

I would like to make one correction to my comments that I filed on March 31, 1997. On page 4, "U.S. Telecommunication Association" should have been "U.S. Telephone Association". I apologize for the confusion.

COMMENTS

I was pleased to learn that Telecommunications for the Deaf, Inc. (TDI) filed their comment requesting consideration of "establishment of a second number for the TRS access by voice telephone users"¹. They have similar positions as my own. Careful consideration of their idea would be greatly appreciated

¹ Telecommunications for the Deaf, Inc., CC Docket No. 92-105, March 31, 1997.

by the deaf community.

Mitch D. Travers in his comments filed with the FCC suggested the gateway concept, Automated Non-TTY Initiated Calling System (ANTICS) in which all non-TTY/ASCII users would call the TTY users' voice number and the call would automatically be re-routed to a relay center which would automatically call the TTY/ASCII user. This is similar to the concept I proposed in a previous filing with the FCC (CC Docket 90-571)². I would like to be given the opportunity to have my calls automatically re-routed to the relay service of my choice.

Many parties expressed concern about the cost and timing of implementing the n11 (i.e. 711). I agree and this is why I urged, in my earlier comments, that we call a summit meeting on a national level to further develop the implementation of the 711³ (and second n11). I strongly believe this will develop unity and a spirit of cooperation among all parties to speed up the implementation of using n11 for TRS. For instance, there are several ideas I have heard the past few weeks about how we can "by-pass" some of the technical problems faced by the local telephone companies, who may not have the necessary equipment, software and switches to handle the n11 implementation. We could explore, for example, a temporary technical solution similar to an idea used in Hawaii...dialing 1-711 until the telephone companies installed the necessary equipment, software, and

² Comments of David J. Nelson, March 17, 1997. See page 16 under "Automatic Call Forward (Personal Voice Number)".

³ Comments of David J. Nelson, CC Docket No. 92-105, March 31, 1997.

switches.

Some commenters expressed concerned about using the TTY Baudot and ASCII as separate phone lines. In fact, many relay services (especially in DC) use the same line for both Baudot and ASCII. The relay center first checks to see if it is an incoming ASCII call. If not, then the call is switched to TTY Baudot. It works out very well. Some of the commenters said there is a high percentage of calls in Baudot. While this is very true, there has been an increase in ASCII calls. If all the TTYS have the v.18 or newer standard codes⁴, I can assure you the percentage of call modes will be reversed.

311 Code for Non-emergency Police Access

I agree with comments filed by the National Association of the Deaf (NAD) that these 311 service centers **must be accessible** by TTY in the same way it is required under ADA for 911. There is no excuse for failing to provide access to 311 when I need to call the non-emergency service center like any other citizen in this country.

CONCLUSION

I appreciate the opportunity to submit these reply comments. We, the deaf and hard of hearing community applaud the FCC for taking the opportunity to seek comments on the Use of N11 Codes. The deaf and hard of hearing community is already excited about the prospect of the N11 Codes to be used when calling into the TRS. We urge the FCC to issue a final rule on the Use of N11

⁴ Comment of David J. Nelson, WT Docket No. 96-198, November 27, 1996 (page 9), CC Docket No. 90-571, March 17, 1997 (page 12) and April 21, 1997 (page 1).

Codes which mirror the comments the deaf and hard of hearing community have presented. We ask that this be accomplished as soon as possible.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "David J. Nelson", written over the printed name.

David J. Nelson
Advocate